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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, *et al.*, individually and  
on behalf of all similarly situated,  
  
Plaintiffs,  
  
v.  
  
GOOGLE LLC,  
  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**[PROPOSED] ORDER GRANTING JOINT  
SUBMISSION RE: SEALING PORTIONS  
OF THE MARCH 20, 2023 ORDER ON (1)  
PLAINTIFFS' MOTION FOR  
ADDITIONAL DISCOVERY SANCTIONS,  
AND GOOGLE'S ADMINISTRATIVE  
MOTION FOR LEAVE TO DEPRECATE,  
AND (2) PRESERVATION OF CERTAIN  
MAPPING AND LINKING TABLES  
(DKTS. 898, 899)**

Judge: Hon. Susan van Keulen, USMJ

**[PROPOSED] ORDER**

Before the Court is the parties' Joint Submission to Seal Portions of the Court's March 20, 2023 Sealed Orders on (1) Plaintiffs' Motion for Additional Discovery Sanctions, and Google's Administrative Motion for Leave to Deprecate, and (2) Preservation of Certain Mapping and Linking Tables (Dkts. 898, 899).

Having considered the Joint Submission, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
March 20, 2023 Order on: (1) Plaintiffs' Motion for Additional Discovery Sanctions, and (2) Google's Administrative Motion for Leave to Deprecate (Dkt. 898)	GRANTED as to the portions at:  Highlighted portions at:  Page 2:11, 3:9, 3:12, 4:4, 4:15, 5:6, 5:10, 5:12-13, 5:15, 5:18, 5:21, 5:23-24, 6:24, 6:28, 7:2-3, 7:10, 7:13, 7:20, 8:1, 8:6-7, 8:22, 8:25, 9:2, 11:20, 12:27, 13:1, 14:1, 16:7-15, 16:17, 16:19-20, 17:1, 17:4, 17:9, 17:11, 17:13, 17:17, 17:20, 18:11-12	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and project code names, data sources, and their proprietary functionalities, as well as internal metrics, that Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. <i>See</i> Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect Google's competitive standing as competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products.
March 20, 2023 Order on: Preservation of Certain Mapping and Linking Tables (Dkt. 899)	GRANTED as to the portions at:  Highlighted portions at:  Pages 1:6, 2:1-4, 2:6, 3:8, 3:10, 3:16, 3:18, 3:20-21, 3:25, 4:3, 4:8,	The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including various types of Google's internal projects and project code names, data sources, and their proprietary functionalities, as well as internal metrics, that Google maintains as

1	4:12, 4:17, 4:19-20,	confidential in the ordinary course of its business
2	4:24-25, 5:1, 5:3, 5:14-	and is not generally known to the public or
3	16, 5:19, 5:21, 5:28, 6:3-	Google's competitors. Such confidential and
4	6, 6:11-13, 6:15-16,	proprietary information reveals Google's
5	6:18-19, 6:21, 6:23-25,	internal strategies, system designs, and business
6	6:27, 7:2, 7:4, 7:16,	practices for operating and maintaining many of
7	7:19, 7:21, 7:24-25,	its important services, and falls within the
8	7:27-28, 8:1, 8:4-5, 8:8,	protected scope of the Protective Order entered
9	8:11-12, 8:14-16, 8:18,	in this action. <i>See</i> Dkt. 81 at 2-3. Public
10	8:23, 8:26, 9:1, 9:6,	disclosure of such confidential and proprietary
11	9:25, 10:5-7, 10:17-19,	information could affect Google's competitive
12	10:23-24, 13: 11, 13:13,	standing as competitors may alter their systems
13	14:8, 14:11, 14:15	and practices relating to competing products. It
14		may also place Google at an increased risk of
15		cybersecurity threats, as third parties may seek to
16		use the information to compromise Google's
17		internal practices relating to competing products.

11  
12 **SO ORDERED.**

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14 DATED: \_\_\_\_\_

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16 HON. SUSAN VAN KEULEN  
17 UNITED STATES MAGISTRATE JUDGE  
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